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December 5, 2023

VIA ECF

The Honorable Valerie Figueredo, U.S.M.J.
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, NY 10007

Re: GateGuard, Inc. v. Amazon.com, Inc. et al., No. 21 Civ. 9321 (JGK) (VF)

Dear Judge Figueredo:

On behalf of Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Logistics, Inc. (collectively, “Amazon”) in the above-captioned action, we respectfully request leave of this Court to depose Ari Teman at FCI Miami pursuant to Federal Rules of Civil Procedure 26 and 30. Mr. Teman is the founder and CEO of Plaintiff GateGuard, Inc. and has testimony relevant to the claims and defenses in this action.

A party must obtain leave of court to depose any person “confined in prison.” Fed. R. Civ. P. 30(a)(2)(B). A court “must grant leave to the extent consistent with Rule 26(b)(1) and (2).” Fed. R. Civ. P. 30(a)(2). Rule 26(b)(1) states that a party “may obtain discovery regarding any nonprivileged matter that is relevant to any party’s claim or defense and proportional to the needs of the case.”

Mr. Teman is currently incarcerated at FCI Miami, a federal correctional institution located in Miami, Florida. While Mr. Teman has reportedly sought compassionate release, his discharge date is uncertain. GateGuard has not objected to Defendants taking the deposition of Mr. Teman at FCI Miami. *See* Ex. A.

On this basis, and pursuant to Rule 30(a)(2) of the Federal Rules of Civil Procedure, Defendants request that this Court grant leave to depose Mr. Teman at FCI Miami.

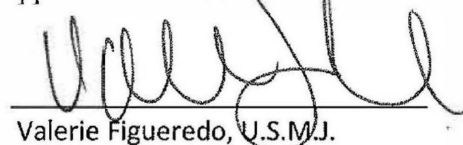
Respectfully submitted,

/s/ Marc Aaron Takagaki

Marc Aaron Takagaki

cc: All Counsel of Record via ECF

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: December 6, 2023

Amazon's motion to depose Mr. Teman is **GRANTED**.
The Clerk of Court is respectfully directed to terminate
the motion at ECF No. 80.